

# EXHIBIT J

Taylor Cheeseman 11/27/2018

1 and this is written by the Department, itself,  
2 right?

3 A. I -- I suppose. I wasn't involved in  
4 the creation of this document.

5 Q. Understood.

6 A. I can't speak to where it came from.

7 Q. Understood.

8 I'm just looking at the title page, and  
9 the title page says it was done by David Chandler,  
10 Commissioner, Department of Child Protection  
11 Services.

12 A. Yes.

13 Q. Okay. So that was the Department's  
14 position in 2016 at least; is that right?

15 A. Correct.

16 Q. Okay. So how do you think that services  
17 can be provided without an adequate workforce  
18 then, without manageable caseloads?

19 A. I'm not saying that services can  
20 provide -- be provided without an adequate  
21 workforce. I disagree with the assessment that  
22 there may be an inadequate one.

23 Q. Okay. So you think that the current  
24 caseload --

25 A. At least now. I mean, I can't speak to

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1 2016 or 2015 because I wasn't around in 2016 or  
2 2015, but I -- in terms of delivering positive  
3 outcomes, we are seeing positive outcomes in this  
4 state with the workforce we have.

5 Q. So you think that you can start with the  
6 workforce you have and move backwards and say the  
7 workforce is now adequate because you're getting  
8 positive outcomes?

9 A. I'm saying that I judge a child welfare  
10 system by the outcomes it produces. Now,  
11 obviously, a competent workforce is a necessary  
12 component in producing those outcomes. Right now,  
13 we're by no means perfect, but our system is  
14 producing some really great outcomes.

15 Q. And this is a system which is now, I  
16 think currently, as of last night, at 53 percent  
17 compliant with the caseload standards; is that  
18 right?

19 A. Yes.

20 Q. Okay. So you think that it's bound to  
21 the Department to maintain caseloads at that  
22 standard?

23 A. I think we may have had caseload  
24 standards.

25 Q. Okay. So you disagree with the RHR?

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1           A.    I -- all I can say is this, like I just  
2   said, I judge a system by its outcomes.  If you're  
3   achieving the outcomes, then obviously the  
4   workforce is capable of doing the work.

5           Q.    So then is it the case that you don't  
6   think the caseload standards are necessary?

7           A.    I don't think they're the right measures  
8   of caseloads.

9           Q.    What do you mean by the "right  
10  measures"?

11          A.    I don't think compliance with a strict  
12  hard caseload cap is the right way in the child  
13  welfare arena to evaluate caseloads.

14                I think, certainly, it is good that we,  
15  as an agency, produce caseload data, right, and  
16  certainly it is necessary that we know how much  
17  work is out there.

18                Certainly it is necessary that as we do,  
19  we make hiring decisions based on workload need,  
20  right, where there's more work, you need more  
21  staff, where there's less work, you need less  
22  staff.

23                With that said, the reality, the nuance  
24  of child welfare work in the real world is too  
25  complex to be reduced to a hard cap.  Every